



November 21, 2017

VIA ECF

Honorable Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Ruane v. Bank of America, N.A. and Chex Systems, Inc.*,
1:17-cv-03704-PKC-PK**

Dear Judge Kuo:

The undersigned, along with Brian Bromberg of Bromberg Law Office, P.C., represents Plaintiff in the above-captioned litigation. Please allow this letter to serve as a request on consent to extend Plaintiff's deadline to file opposition to Defendant Bank of America, N.A.'s Motion to Strike Jury Demand, from November 22, 2017 to December 6, 2017. Counsel for Defendant Bank of America, N.A. ("BANA"), consents to this request. This is Plaintiff's first request for an extension of time, and is made as Mr. Bromberg has been traveling on business for the last two weeks. We apologize for submitting this request less than two business days prior to the deadline for which the extension is sought, as instructed by your Individual Practice Rules.

BANA also requests leave to submit a reply to Plaintiff's Opposition on or before December 20, 2017. Plaintiff has no objection to this request.

Finally, and in light of the above, we request, on consent of all parties, to adjourn the Initial Conference from December 14, 2017 to January 8, 2018, or a date thereafter as set by the Court. The parties have agreed to meet and confer for a Rule 26 conference on December 29, 2017. Please find below a proposed Revised Scheduling Order, the dates in which have been approved by counsel for all parties.

Sincerely,
/s/ Eve Weissman

Eve Weissman, Esq.
Staff Attorney

CC: all counsel of record via ECF

Proposed Revised Scheduling Order: An Initial Conference will be held in this case on **January 8, 2018**, or a date thereafter that is set by the Court, at 10:30 a.m. before Peggy Kuo, United States Magistrate Judge in Courtroom 11C South of the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York. All counsel are required to attend. Counsel are directed to the Court's Initial Conference Order for instructions. Counsel are required to bring to the conference a completed copy of the Court's Rule 26(f) Conference Checklist, and to file before the conference a completed copy of the Court's proposed Initial Scheduling Order, a pdf-fillable version of which may be found at: <https://www.nycourts.gov/pub/PK-schedo.pdf>. Any request for adjournment of this or any other conference must be made in writing on notice to opposing parties, and must disclose whether or not all parties consent. No request for adjournment will be considered unless made at least two (2) business days before the scheduled conference, except in the event of an emergency. Plaintiff shall file any opposition to the Motion to Strike Jury Demand by **December 6, 2017**. Defendant Bank of America, N.A. shall file any Reply by **December 20, 2017**. The parties should be prepared to address the Motion during the Initial Conference. Ordered by Magistrate Judge Peggy Kuo on [November 21, 2017].